

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE, TEXAS

UNITED STATES OF AMERICA

Criminal Complaint

VS

1) MARTINEZ, Francisco

A213 288 366

Case Number 1: 19 PO 042

2) CARDOZA, Erica

A213 288 367

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 11, 2019 in Cameron County, in the SOUTHERN District of TEXAS defendants, did

knowingly, willfully, and in violation of law aid and abet two undocumented minor aliens to attempt to gain illegal entry into the United States by a willfully false or misleading representation or willful concealment of a material fact,

in violation of Title 18 United States Code, Section(s) 2 and

in violation of Title 8 United States Code, Section(s) 1325 (a) (3).

I further state that I am a (n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendants did aid and abet two undocumented minor aliens to attempt to gain illegal entry into the United States from Mexico through the vehicle primary lanes at the Gateway International Bridge in Brownsville, TX. MARTINEZ was the driver of vehicle they were traveling in accompanied by CARDOZA who is his wife and the two undocumented minor aliens. Upon inspection, defendant CARDOZA claimed the two minors were her children and claimed they were citizens of the United States by birth in Harlingen, TX to a Customs and Border Protection Officer. Defendant MARTINEZ also claimed the minors were his children and that they were citizens of the United States to a Customs and Border Protection Officer. After further inspection, Customs and Border Protection Officers identified the undocumented minor aliens as J.M.C. and J.M.C. The minor aliens were determined to be citizens and nationals of Mexico with no legal status to enter or to be in the United States. After further interview, MARTINEZ admitted that the undocumented minor aliens are not his children and that they are not citizens of the United States. MARTINEZ further admitted that he knew the two undocumented minor aliens are citizens of Mexico and that he was going to be paid \$600.00 USD for crossing the undocumented minor aliens into the United States. CARDOZA declined to give a statement.

Continued on the attached sheet and made a part hereof: :Yes X :No

Signature of Complainant
Armando Espinoza Jr.

Sworn to before me and subscribed in my presence,

August 12, 2019

Date

at

BROWNSVILLE, Texas

City and State

Ignacio Torteya III U.S. MAGISTRATE JUDGE

Name & Title of Judicial Officer

Signature of Judicial Officer